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PHILLIPS 66 COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

DEAN A. ROBBINS and TIMOTHY
GREEN, on behalf of themselves, all others
similarly situated,

| Case No. 3:18-cv-00292-RS
(consolidated Case No. 19-cv-01558-RS)

**STIPULATION AND [PROPOSED]
ORDER REGARDING DISCOVERY**

PHILLIPS 66 COMPANY, a Delaware corporation; and DOES 1 through 50, inclusive

Action Removed: January 12, 2018
Action Filed: November 27, 2017

Defendant.

1 Plaintiffs Dean Robbins, Timothy Green, Ian Clare, and Keith Washington (“Plaintiffs”)
2 and Phillips 66 Company (“Defendant”) (collectively, the “Parties”), through their respective
3 counsel of record, stipulate and agree as follows:

4 WHEREAS, on or about June 5, 2023, Plaintiffs requested that Defendant produce
5 timekeeping and payroll data of Phillips 66’s non-exempt employees in California for the time
6 period of March 30, 2021 to the present;

7 WHEREAS, Defendant has agreed to produce timekeeping and payroll data of Defendant’s
8 non-exempt employees in California for the time period of March 30, 2021 to the present, as
9 relevant to Plaintiffs’ cause of action under the California Private Attorneys General Act (“PAGA”)
10 only and for no other purpose;

11 WHEREAS, nothing in this stipulation is intended or should be construed as an admission
12 by either party as to the relevance of the timekeeping and payroll data being produced, and this
13 stipulation has no bearing on any dispute regarding the relevance of the data being produced with
14 respect to Plaintiffs’ class and PAGA claims;

15 WHEREAS, Defendant has agreed to produce the aforementioned timekeeping and payroll
16 data by August 31, 2023;

17 WHEREAS, Plaintiffs have requested that the Parties file a stipulation with respect to the
18 Parties’ agreement; and

19 Accordingly, the Parties stipulate, subject to the Court’s approval, as follows:

20 On or before August 31, 2023, Phillips 66 will produce timekeeping and payroll data of
21 Phillips 66’s non-exempt employees in California for the time period of March 30, 2021 to the
22 present.

23 IT IS SO STIPULATED.

24 Dated: August 11, 2023

SETAREH LAW GROUP

25 By: /s/ Thomas Segal
Shaun Setareh
Thomas Segal
Farrah Grant

26
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28 Attorneys for Plaintiffs

1 Dated: August 11, 2023

BAKER & HOSTETLER LLP

2 By: /s/ Nicholas D. Popper
3 Michael S. Chamberlin
4 Nicholas D. Popper

Attorneys for Defendant
PHILLIPS 66 COMPANY

6 **ATTESTATION**

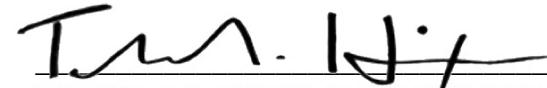
7 I, Thomas Segal, attest that all other signatures listed, and on whose behalf the filing is
8 submitted, concur in the filing's contents and have authorized the filing.

10 /s/ Thomas Segal

1 **[PROPOSED] ORDER**
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4 Pursuant to the Parties' stipulation, IT IS SO ORDERED.
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10 DATED: August 11, 2023
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13 HONORABLE THOMAS S. HIXSON
14 United States Magistrate Judge
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